

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

JEFFREY W. CARPENTER, §
§
Plaintiff, §
§
v. § Case No.: 3:23-CV-00769-N
§
TWIN CITY FIRE INSURANCE §
COMPANY, §
§
Defendant. §

**DEFENDANT'S UNOPPOSED MOTION
TO APPROVE JUDGMENT SECURITY**

TO THE UNITED STATES DISTRICT COURT:

Defendant Twin City Fire Insurance Company respectfully moves this Court to approve security for a stay of the judgment and post-judgment orders pending appeal pursuant to Rule 62 of the Federal Rules of Civil Procedure.

On May 27, 2025, the Court entered its Final Judgment against Twin City for the amounts stated therein. *See* ECF No. 74. On May 29, 2025, Twin City filed its Notice of Appeal of the Final Judgment to the United States Court of Appeals for the Fifth Circuit. *See* ECF No. 75.

The parties have agreed that the amount of security necessary to effectuate a stay under Rule 62 shall be \$3,292,922.44. Accordingly, Twin City has secured a

bond for this stated sum. Exhibit A. Twin City respectfully requests the Court to accept and approve the bond to effectuate a stay of the Final Judgment and post-judgment order while the case remains pending on appeal. Additionally, Twin City requests all other relief to which it may be entitled.

Respectfully submitted,

CHAMBERLAIN, HRDLICKA, WHITE,
WILLIAMS & AUGHTRY, P.C.

By: /s/ Steven J. Knight
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*Counsel for Twin City Fire Insurance
Company*

CERTIFICATE OF CONFERENCE

I certify that I conferred with Plaintiff Jeffrey Carpenter's counsel concerning the relief stated herein, and counsel informed me that Plaintiff is unopposed.

/s/ Steven J. Knight
STEVEN J. KNIGHT

CERTIFICATE OF SERVICE

I certify a true and correct copy of the foregoing notice of appeal has been served upon all counsel of record via the Court's electronic service system on July 22, 2025.

/s/ Steven J. Knight
STEVEN J. KNIGHT